

IN THE UNITED STATES DISTRICT FOR
THE DISTRICT OF NEW HAMPSHIRE

JEANICE FARLEY, individually and §
on behalf of MICHAEL FARLEY, an §
incompetent adult, §
§
Plaintiff §
§
vs. § No. 1:13-cv-261-LM
UNITED STATES OF AMERICA, §
§
Defendant §
§
§
§

**JOINT MOTION TO ESTABLISH MICHAEL FARLEY 2015
IRREVOCABLE REVERSIONARY MEDICAL CARE TRUST**

The parties jointly move and request the Court to establish the Michael Farley 2015 Irrevocable Reversionary Medical Care Trust, to effectuate the final judgment of this Court, entered on April 7, 2015. The parties are in agreement on the terms and conditions of the establishing trust document as stated in attached Exhibit A. The Parties agree to the creation of the Michael Farley 2015 Irrevocable Reversionary Medical Care Trust on terms and conditions set out in the proposed trust document attached as Exhibit A. The parties differ on one issue – whether the Court intended that this trust be funded in the amount of \$13,368,710.62 or if the trust should be funded in the amount remaining after deduction of pro rata share of attorney fees and costs.

Respectfully Submitted,

/s/

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/s/ (signed with permission)
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CERTIFICATE OF SERVICE

By my signature above, I certify that a copy of this motion has been sent to the following on April 22, 2015 via the Court's CM/ECF notice system.

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